

MOSER LAW FIRM, PC



Paul A. Pagano

Tel: 917.589.1479

paul.pagano@moserlawfirm.com

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VIA ECF

Hon. Gary R. Brown
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 840
Central Islip, NY 11722-9014

Re: *Caccavale, et. al. v. Hewlett-Packard Company a/k/a HP Inc. et. al.*
Docket No: 20-cv-00974(GRB)(AKT)

Dear Hon. Gary R. Brown:

This firm represents Plaintiffs Tony Caccavale (“Caccavale”), Anthony Mangelli (“Mangelli”), Douglas Sorbie (“Sorbie”) and James Billups (“Billups”) individually and on behalf of all others similarly situated (collectively “Plaintiffs”) in connection with the above referenced matter. This afternoon, Defendants Hewlett-Packard Company a/k/a HP Inc. and Hewlett Packard Enterprise Company (collectively the “HP Defendants”) filed a letter requesting a pre-motion conference for the purpose of moving to dismiss Plaintiffs’ second amended complaint (“SAC”)(D.E. 57). Also this afternoon, Defendant Unisys Corporation (“Defendant Unisys”) filed a letter requesting a pre-motion conference for the purpose of moving to dismiss the SAC (D.E. 58). Plaintiffs would like to have the opportunity to fully respond to both letters. In light of the imminent holidays, Plaintiffs respectfully request that their oppositions to the HP Defendants’ and Defendant Unisys’ pre-motion letters be permitted to be filed on or before January 4, 2021.

Respectfully Submitted,
Moser Law Firm, P.C.

Paul Pagano
By: Paul A. Pagano